# **TCEQ Interoffice Memorandum**

**To:** Tony Walker

Director, TCEQ Region 4, Dallas/Fort Worth

Alyssa Taylor

Special Assistant to the Regional Director, TCEQ Region 4, Dallas/Fort Worth

From: Shannon Ethridge, M.S., D.A.B.T. S.E.

Toxicology Division, Office of the Executive Director

**Date:** December 19, 2014

**Subject:** Toxicological Evaluation of Results from an Ambient Air Sample for Volatile

Organic Compounds Collected Downwind of the Chesapeake Operating Inc., Bennett B Pad (Latitude 32.36772, Longitude -97.442122) near Cleburne, Johnson

County, Texas

Sample Collected on October 29, 2014, Request Number 1411004 (Lab Sample

1411004-001)

# **Key Points**

• Reported concentrations of target volatile organic compounds (VOCs) were either not detected or were detected below levels of short-term health and/or welfare concern.

# **Background**

On October 29, 2014, a Texas Commission on Environmental Quality (TCEQ) Region 4 air investigator collected a 30-minute canister sample (Lab Sample 1411004-001) downwind of the Chesapeake Operating Inc., Bennett B Pad (Latitude 32.36772, Longitude -97.442122) near Cleburne, Johnson County, Texas. The investigator did not experience odors or health effects while sampling. Meteorological conditions measured at the site or nearest stationary ambient air monitoring site indicated that the ambient temperature was 61.4°F with a relative humidity of 60.1%, and winds were from the north northeast (20°) at 4.9 to 6.3 miles per hour. The sampling site was at the fenceline/property line of the possible emission source (multiple emission sources). The nearest location where the public could have access was approximately 301 to 500 feet from the possible emission source. The sample was sent to the TCEQ laboratory in Austin, Texas, and analyzed for a range of VOCs. The list of the target analytes that were evaluated in this review is provided in Attachment A. The VOC concentrations were reported in parts per billion by volume (ppbv) (Attachment B and Table 1). Please note that the available canister technology and analysis method cannot capture and/or analyze for all chemicals.

Tony Walker et al. Page 2 December 19, 2014

#### **Results and Evaluation**

Reported VOC concentrations were compared to TCEQ's short-term health- and/or welfare-based air monitoring comparison values (AMCVs) (Table 1). Short-term AMCVs are guidelines used to evaluate ambient concentrations of a chemical in air and to determine its potential to result in adverse health effects, adverse vegetative effects, or odors. Health AMCVs are set to provide a margin of safety and are set well below levels at which adverse health effects are reported in the scientific literature. If a chemical concentration in ambient air is less than its comparison value, no adverse health effects are expected to occur. If a chemical concentration exceeds its comparison value it does not necessarily mean that adverse effects will occur, but rather that further evaluation is warranted.

All of the 84 VOCs were either not detected or were detected below their respective short-term AMCVs. Exposure to levels of VOCs measured in this sample would not be expected to cause short-term adverse health effects, adverse vegetative effects, or odors.

Please call me at (512) 239-1822 if you have any questions regarding this evaluation.

Tony Walker et al. Page 3 December 19, 2014

#### Attachment A

## **List of Target Analytes for Canister Samples**

ethane ethylene acetylene propane propylene dichlorodifluoromethane methyl chloride isobutane vinyl chloride 1-butene 1.3-butadiene n-butane t-2-butene bromomethane c-2-butene

3-methyl-1-butene

isopentane

trichlorofluoromethane

1-pentene n-pentane isoprene t-2-pentene

1,1-dichloroethylene

c-2-pentene

methylene chloride 2-methyl-2-butene 2,2-dimethylbutane cyclopentene

4-methyl-1-pentene 1,1-dichloroethane cyclopentane 2,3-dimethylbutane 2-methylpentane 3-methylpentane

2-methyl-1-pentene + 1-hexene

n-hexane chloroform t-2-hexene c-2-hexene

1.2-dichloroethane methylcyclopentane 2,4-dimethylpentane 1,1,1-trichloroethane

benzene

carbon tetrachloride

cyclohexane 2-methylhexane 2,3-dimethylpentane 3-methylhexane 1,2-dichloropropane trichloroethylene 2,2,4-trimethylpentane 2-chloropentane

n-heptane

c-1,3-dichloropropylene methylcyclohexane

t-1,3-dichloropropylene 1,1,2-trichloroethane 2,3,4-trimethylpentane

toluene

2-methylheptane 3-methylheptane 1.2-dibromoethane

n-octane

tetrachloroethylene chlorobenzene ethylbenzene m & p-xylene

styrene

1,1,2,2-tetrachloroethane

o-xylene n-nonane

isopropylbenzene n-propylbenzene m-ethyltoluene p-ethyltoluene

1,3,5-trimethylbenzene

o-ethyltoluene

1,2,4-trimethylbenzene

n-decane

1,2,3-trimethylbenzene m-diethylbenzene p-diethylbenzene n-undecane

Tony Walker et al. Page 4 December 19, 2014

## **Attachment B**

11/13/2014

## Texas Commission on Environmental Quality

Laboratory and Quality Assurance Section P.O. Box 13087, MC-165 Austin, Texas 78711-3087 (512) 239-1716

#### Laboratory Analysis Results Request Number: 1411004

Kequ	est ivalider. 1411004		
Request Lead: Jaydeep Patel	Region: T04	Date Rec	eived: 11/4/2014
Project(s): Barnett Shale			
Facility(ies) Sampled	City	County	Facility Type
Chesapeake Operating Inc., Bennett B Pad	Cleburne	Johnson	
Sample(s) Received			
Field ID Number: 00256-102914 Laborat Sampling Site: Comments: Canister 00256 was used to collect a 30 Requested Laboratory Procedure(s):		pled: 10/29/14	ampled by: Glendora Lopez 4 09:56:00 Valid Sample: Yes
Analysis; AP001VOC Determination of VOC Canisters by GC/MS Using M	Modified Method TO-15		
Please note that this analytical technique is adverse health effects. For questions on the (512) 239-1716. For an update on the health Division at (512) 239-1795.	analytical procedures ple	ease contact	the laboratory manager at
Analyst: <u>A. Mathew</u>		Date:	113/14
Laboratory Manager: Jaylee Pales		Date: 11	14/14

# Laboratory Analysis Results

Request Number: 1411004 Analysis Code: AP001VOC

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1411004-001									
		0025	6-102914						
		0	0256						
Conç.	SDL	SQL	Analysis Date	Fiags**	Conc.	SDL	SQL	Analysis Date	Flags**
7.6	1.0	2,4	11/9/2014	T,DI					
0,91	1.0	2.4	11/9/2014	J,T,DI					
ND	1.0	2.4	11/9/2014	T,D1					
2.1	1.0	2.4	11/9/2014	L,T,D1					
ND	1.0	2,4	11/9/2014	T,D1					
0.56	0.40	1.2	11/9/2014	L,D1					
0.65	0.40	1.2	11/9/2014	L,D1			Î		
0.33	0.46	2,4	11/9/2014	J,D1					
ND	0,34	1,2	11/9/2014	D1					
0.16	0.40	1.2	11/9/2014	J,D1		<u> </u>			
ND	0.54	1.2	11/9/2014	D1					
0.91	0.40	2.4	11/9/2014	L <sub>2</sub> D1	1				
ND	0.36	1.2	11/9/2014	D1	1				
ND	0.54	1.2	11/9/2014	D1	<u> </u>	<u> </u>	1		
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## Laboratory Analysis Results Request Number: 1411004

Analysis Code: AP001VOC

Leb ID			1411	004-001						
Compound	Cone.	SDL	SQL	Analysis Date	Fings**	Conc.	SDL	SQL	Analysis Date	Plags**
3-methylhexane	ND	0.40	1,2	11/9/2014	D1					
1,2-dichloropropane	ND	0.34	1.2	11/9/2014	DI	ĺ				
trichloroethylene	ND	0.58	1.2	11/9/2014	D1					
2,2,4-trimethylpentane	ND	0.48	1.2	11/9/2014	DI					
2-chloropentane	ND	0.54	1,2	11/9/2014	DI					
n-heptane	0.05	0.50	2.4	11/9/2014	J,D1					
c-1,3-dichloropropylene	ND	0.40	1,2	11/9/2014	D1					
methyleyelohexane	ND	0.52	2,4	11/9/2014	DI		:			
t-1,3-dichloropropylene	ND	0.40	1.2	11/9/2014	D1					
1,1,2-trickloroethane	ND	0.42	1.2	11/9/2014	D1					
2,3,4-trimethylpentane	0.02	0.48	2.4	11/9/2014	J,D1					
toluene	0.16	0.54	1.2	11/9/2014	J,DI		l			
2-methylheptane	ND	0.40	2.4	11/9/2014	D1					
3-methylhoptano	ND	0.46	2.4	11/9/2014	D1					
1,2-dibromoethane	ND	0.40	1.2	11/9/2014	DI					
n-octane	0.03	0.38	2,4	11/9/2014	J,D1		l			
tetrachloroethylene	0.01	0.48	1.2	11/9/2014	J,D1					
chlorobenzene	ND	0.54	1,2	11/9/2014	D!					
ethylbenzene	0.03	0.54	2,4	11/9/2014	J,D1	-		1		
m & p-xylene	80,0	0.54	4.8	11/9/2014	J,D1					
styrene	0.02	0.54	2.4	11/9/2014	J,D1					
1,1,2,2-tetrachloroethane	ND	0.40	1,2	11/9/2014	D1					
o-xylene	0.02	0.54	2,4	11/9/2014	J,DI					
n-nonane	ND	0.44	1.2	11/9/2014	D1		Ī			
isopropylbenzene	ND	0.48	1.2	11/9/2014	D1					
n-propylbenzene	0.01	0.54	1,2	11/9/2014	J,DI					
m-ethyltoluene	ND	0.22	1.2	11/9/2014	D1			L		
p-ethyltoluene	0.04	0.32	2,4	11/9/2014	J,D1					
1,3,5-trimethylbenzene	ND	0.50	2,4	11/9/2014	D1					
o-ethyltoluene	0,01	0.26	2.4	11/9/2014	J,D1					
1,2,4-trimethy/benzene	ND	0.54	1.2	11/9/2014	D1					
n-decane	0.01	0.54	2.4	11/9/2014	J,DI					
1,2,3-trimethylbenzene	ND	0.54	1,2	11/9/2014	DI					
m-diethylbenzene	ND	0.54	2.4	11/9/2014	DI					
p-diethylbenzene	ND	0.54	1.2	11/9/2014	D1					
n-undecane	ND	0.54	2.4	11/9/2014	D1					

## Laboratory Analysis Results Request Number: 1411004 Analysis Code: AP001VOC

#### Qualifier Notes:

- ND not detected
- NQ concentration can not be quantified due to possible interferences or coclutions, SDL Sample Detection Limit (Limit of Detection adjusted for dilutions).
- SQL Sample Quantitation Limit (Limit of Quantitation adjusted for dilution).
- INV Invalid.

- J Reported concentration is below SDL.
  L Reported concentration is at or above the SDL and is below the lower limit of quantitation.
  E Reported concentration exceeds the upper limit of instrument calibration.
  M Result modified from previous result.
  T- Data was not confirmed by a confirmational analysis. Compound and/or results is tentatively identified.
- P Patablished acceptance criteria was not met due to factors outside the laboratory's control. H Not all associated hold time specifications were met. Data may be biased. C Sample received with a missing or broken custody seal.

- R Sample received with a missing or incomplete chain of custody.
- I Sample received without a legible unique identifier.
- G Sample received in an improper container.
   U Sample received with insufficient sample volume.
- W Sample recevied with insufficient preservation.

Quality control notes for AP001VOC samples.

D1-Sample concentration was calculated using a dilution factor of 4.

TCEQ laboratory customer support may be reached at Jaydeep.Patel@tceq.texas.gov

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Tony Walker et al. Page 8 December 19, 2014

Table 1. Comparison of Monitored Concentrations in Lab Sample 1411004-001 to TCEQ Short-Term AMCVs

Lab Sample ID	1411004-001					
Compound	Odor AMCV (ppb <sub>v</sub> )	Short-Term Health AMCV (ppb <sub>v</sub> )	SQL (ppb <sub>v</sub> )	Concentrations (ppb <sub>v</sub> )	Flags	SDL (ppb <sub>v</sub> )
1,1,1-Trichloroethane	380,000	1,700	1.2	0.01	J,D1	0.52
1,1,2,2-Tetrachloroethane	7,300	10	1.2	ND	D1	0.4
1,1,2-Trichloroethane	Not Available	100	1.2	ND	D1	0.42
1,1-Dichloroethane	Not Available	1,000	1.2	ND	D1	0.38
1,1-Dichloroethylene	Not Available	180	1.2	ND	D1	0.36
1,2,3-Trimethylbenzene	Not Available	250	1.2	ND	D1	0.54
1,2,4-Trimethylbenzene	140	250	1.2	ND	D1	0.54
1,2-Dibromoethane	Not Available	0.5	1.2	ND	D1	0.4
1,2-Dichloroethane	6,000	40	1.2	ND	D1	0.54
1,2-Dichloropropane	250	100	1.2	ND	D1	0.34
1,3,5-Trimethylbenzene	Not Available	250	2.4	ND	D1	0.5
1,3-Butadiene	230	1,700	1.2	ND	D1	0.54
1-Butene	360	27,000	1.2	0.16	J,D1	0.4
1-Pentene	100	2,600	1.2	ND	D1	0.54
2,2,4-Trimethylpentane	670	750	1.2	ND	D1	0.48
2,2-Dimethylbutane (Neohexane)	Not Available	1,000	1.2	ND	D1	0.42
2,3,4-Trimethylpentane	Not Available	750	2.4	0.02	J,D1	0.48
2,3-Dimethylbutane	420	990	2.4	ND	D1	0.56
2,3-Dimethylpentane	4,500	850	1.2	ND	D1	0.52
2,4-Dimethylpentane	940	850	2.4	ND	D1	0.54
2-Chloropentane (as chloroethane)	Not Available	240	1.2	ND	D1	0.54
2-Methyl-1-Pentene +1-Hexene	140	500	4.8	ND	D1	0.4
2-Methyl-2-Butene	Not Available	2,600	1.2	ND	D1	0.46
2-Methylheptane	110	750	2.4	ND	D1	0.4
2-Methylhexane	420	750	1.2	ND	D1	0.54

Tony Walker et al. Page 9 December 19, 2014

Lab Sample ID	1411004-001					
Compound	Odor AMCV (ppb <sub>v</sub> )	Short-Term Health AMCV (ppb <sub>v</sub> )	SQL (ppb <sub>v</sub> )	Concentrations (ppb <sub>v</sub> )	Flags	SDL (ppb <sub>v</sub> )
2-Methylpentane (Isohexane)	7,000	850	1.2	0.1	J,D1	0.54
3-Methyl-1-Butene	250	8,000	1.2	ND	D1	0.46
3-Methylheptane	1,500	750	2.4	ND	D1	0.46
3-Methylhexane	840	750	1.2	ND	D1	0.4
3-Methylpentane	8,900	1,000	1.2	0.07	J,D1	0.46
4-Methyl-1-Pentene (as hexene)	140	500	2.4	ND	D1	0.44
Acetylene	Not Available	25,000	2.4	ND	T,D1	1
Benzene	2,700	180	1.2	ND	D1	0.54
Bromomethane (methyl bromide)	Not Available	30	1.2	ND	D1	0.54
c-1,3-Dichloropropylene	Not Available	10	1.2	ND	D1	0.4
c-2-Butene	2,100	15,000	1.2	ND	D1	0.54
c-2-Hexene	140	500	2.4	ND	D1	0.54
c-2-Pentene	Not Available	2,600	2.4	ND	D1	0.5
Carbon Tetrachloride	4,600	20	1.2	0.08	J,D1	0.54
Chlorobenzene (phenyl chloride)	1,300	100	1.2	ND	D1	0.54
Chloroform (trichloromethane)	3,800	20	1.2	0.02	J,D1	0.42
Cyclohexane	2,500	1,000	1.2	ND	D1	0.48
Cyclopentane	Not Available	1,200	1.2	ND	D1	0.54
Cyclopentene	Not Available	2,900	1.2	ND	D1	0.4
Dichlorodifluoromethane	Not Available	10,000	1.2	0.56	L,D1	0.4
Ethane	Not Available	Simple Asphyxiant*	2.4	7.6	T,D1	1
Ethylbenzene	170	20,000	2.4	0.03	J,D1	0.54
Ethylene	270,000	500,000	2.4	0.91	J,T,D1	1
Isobutane	Not Available	33,000	2.4	0.33	J,D1	0.46
Isopentane (2-methylbutane)	1,300	68,000	4.8	0.35	J,D1	0.54
Isoprene	48	20	1.2	ND	D1	0.54

Tony Walker et al. Page 10 December 19, 2014

Lab Sample ID	1411004-001					
Compound	Odor AMCV (ppb <sub>v</sub> )	Short-Term Health AMCV (ppb <sub>v</sub> )	SQL (ppb <sub>v</sub> )	Concentrations (ppb <sub>v</sub> )	Flags	SDL (ppb <sub>v</sub> )
Isopropylbenzene (cumene)	48	500	1.2	ND	D1	0.48
m & p-Xylene (as mixed isomers)	80	1,700	4.8	0.08	J,D1	0.54
m-Diethylbenzene	70	460	2.4	ND	D1	0.54
Methyl Chloride (chloromethane)	Not Available	500	1.2	0.65	L,D1	0.4
Methylcyclohexane	150	4,000	2.4	ND	D1	0.52
Methylcyclopentane	1,700	750	2.4	0.05	J,D1	0.54
Methylene Chloride (dichloromethane)	160,000	3,500	1.2	0.09	J,D1	0.28
m-Ethyltoluene	18	250	1.2	ND	D1	0.22
n-Butane	1,200,000	92,000	2.4	0.91	L,D1	0.4
n-Decane	620	1,750	2.4	0.01	J,D1	0.54
n-Heptane	670	850	2.4	0.05	J,D1	0.5
n-Hexane	1,500	1,800	2.4	ND	D1	0.4
n-Nonane	Not Available	2,000	1.2	ND	D1	0.44
n-Octane	1,700	750	2.4	0.03	J,D1	0.38
n-Pentane	1,400	68,000	4.8	0.2	J,D1	0.54
n-Propylbenzene	48	500	1.2	0.01	J,D1	0.54
n-Undecane	870	550	2.4	ND	D1	0.54
o-Ethyltoluene	74	250	2.4	0.01	J,D1	0.26
o-Xylene	380	1,700	2.4	0.02	J,D1	0.54
p-Diethylbenzene	70	460	1.2	ND	D1	0.54
p-Ethyltoluene	8.1	250	2.4	0.04	J,D1	0.32
Propane	1,500,000	Simple Asphyxiant*	2.4	2.1	L,T,D1	1
Propylene	13,000	Simple Asphyxiant*	2.4	ND	T,D1	1
Styrene	25	5,100	2.4	0.02	J,D1	0.54
t-1,3-Dichloropropylene	Not Available	10	1.2	ND	D1	0.4
t-2-Butene	2,100	15,000	1.2	ND	D1	0.36

Tony Walker et al.

Page 11

December 19, 2014

Lab Sample ID	1411004-001						
Compound	Odor AMCV (ppb <sub>v</sub> )	Short-Term Health AMCV (ppb <sub>v</sub> )	SQL (ppb <sub>v</sub> )	Concentrations (ppb <sub>v</sub> )	Flags	SDL (ppb <sub>v</sub> )	
t-2-Hexene	140	500	2.4	ND	D1	0.54	
t-2-Pentene	Not Available	2,600	2.4	ND	D1	0.54	
Tetrachloroethylene	770	1,000	1.2	0.01	J,D1	0.48	
Toluene	920	4,000	1.2	0.16	J,D1	0.54	
Trichloroethylene	3,900	100	1.2	ND	D1	0.58	
Trichlorofluoromethane	5,000	10,000	1.2	ND	D1	0.58	
Vinyl Chloride	Not Available	26,000	1.2	ND	D1	0.34	

<sup>\*</sup>A simple asphyxiant displaces air, lowering the partial pressure of oxygen and causing hypoxia at sufficiently high concentrations. ppbv - Parts per billion by volume.

ND - Not detected.

NQ - Concentration can not be quantified due to possible interferences or coelutions.

SDL - Sample Detection Limit (Limit of Detection adjusted for dilution).

SQL – Sample Quantitation Limit (Limit of Quantitation adjusted for dilution).

INV - Invalid.

J - Reported concentration is below SDL.

L - Reported concentration is at or above the SDL and is below the lower limit of quantitation.

E - Reported concentration exceeds the upper limit of instrument calibration.

M - Result modified from previous result.

T - Data was not confirmed by a confirmational analysis. Data is tentatively identified.

F - Established acceptance criteria were not met due to factors outside the laboratory's control.

H – Not all associated hold time specifications were met. Data may be biased.

C - Sample received with a missing or broken custody seal.

R - Sample received with a missing or incomplete chain of custody.

I - Sample received without a legible unique identifier.

G - Sample received in an improper container.

U - Sample received with insufficient sample volume.

W - Sample received with insufficient preservation.

D1 - Sample concentration was calculated using a dilution factor of 4.

Tony Walker et al. Page 12 December 19, 2014

Table 2. TCEQ Long-Term Air Monitoring Comparison Values (AMCVs)

Please Note: The long-term AMCVs are provided for informational purposes only because it is scientifically inappropriate to compare short-term monitored values to the long-term AMCV.

Compound	Long-Term Health AMCV (ppb <sub>v</sub> )	Compound	Long-Term Health AMCV (ppb <sub>v</sub> )
1,1,1-Trichloroethane	940	Cyclopentane	120
1,1,2,2-Tetrachloroethane	1	Cyclopentene	290
1,1,2-Trichloroethane	10	Dichlorodifluoromethane	1,000
1,1-Dichloroethane	100	Ethane	Simple Asphyxiant*
1,1-Dichloroethylene	86	Ethylbenzene	450
1,2,3-Trimethylbenzene	25	Ethylene**	5,300
1,2,4-Trimethylbenzene	25	Isobutane	2,400
1,2-Dibromoethane	0.05	Isopentane (2-methylbutane)	8,000
1,2-Dichloroethane	1	Isoprene	2
1,2-Dichloropropane	10	Isopropylbenzene (cumene)	50
1,3,5-Trimethylbenzene	25	m & p-Xylene (as mixed isomers)	140
1,3-Butadiene	9.1	m-Diethylbenzene	46
1-Butene	2,300	Methyl Chloride (chloromethane)	50
1-Pentene	Not Available	Methylcyclohexane	400
2,2,4-Trimethylpentane	75	Methylcyclopentane	75
2,2-Dimethylbutane (Neohexane)	100	Methylene Chloride (dichloromethane)	100
2,3,4-Trimethylpentane	75	m-Ethyltoluene	25
2,3-Dimethylbutane	99	n-Butane	2,400
2,3-Dimethylpentane	85	n-Decane	175
2,4-Dimethylpentane	85	n-Heptane	85
2-Chloropentane (as chloroethane)	24	n-Hexane	190
2-Methyl-1-Pentene +1-Hexene	50	n-Nonane	200

Tony Walker et al. Page 13 December 19, 2014

Compound	Long-Term Health AMCV (ppb <sub>v</sub> )	Compound	Long-Term Health AMCV (ppb <sub>v</sub> )
2-Methyl-2-Butene	Not Available	n-Octane	75
2-Methylheptane	75	n-Pentane	8,000
2-Methylhexane	75	n-Propylbenzene	50
2-Methylpentane (Isohexane)	85	n-Undecane	55
3-Methyl-1-Butene	800	o-Ethyltoluene	25
3-Methylheptane	75	o-Xylene	140
3-Methylhexane	75	p-Diethylbenzene	46
3-Methylpentane	100	p-Ethyltoluene	25
4-Methyl-1-Pentene (as hexene)	50	Propane	Simple Asphyxiant*
Acetylene	2,500	Propylene	Simple Asphyxiant*
Benzene	1.4	Styrene	110
Bromomethane (methyl bromide)	3	t-1,3-Dichloropropylene	1
c-1,3-Dichloropropylene	1	t-2-Butene	690
c-2-Butene	690	t-2-Hexene	50
c-2-Hexene	50	t-2-Pentene	Not Available
c-2-Pentene	Not Available	Tetrachloroethylene***	3.8
Carbon Tetrachloride	2	Toluene	1,100
Chlorobenzene (phenyl chloride)	10	Trichloroethylene	10
Chloroform (trichloromethane)	2	Trichlorofluoromethane	1,000
Cyclohexane	100	Vinyl Chloride	0.45

<sup>\*</sup>A simple asphyxiant displaces air, lowering the partial pressure of oxygen and causing hypoxia at sufficiently high concentrations.

<sup>\*\*</sup>Long-term vegetation AMCV for Ethylene is 30 ppb.

<sup>\*\*\*</sup>Long-term vegetation AMCV for Tetrachloroethylene is 12 ppb.